

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**ROBERT DAVID STEELE *et al.*,**

**Plaintiffs,**

**v.**

**Civil Action No. 3:17cv601**

**JASON GOODMAN *et al.*,**

**Defendants.**

**DEFENDANT PATRICIA A. NEGRON'S  
MOTION TO DISMISS THE AMENDED COMPLAINT**

NOW COMES Defendant, Patricia A. Negron (“Ms. Negron” or “Defendant”), by counsel and pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and hereby moves the Court to dismiss her from the Amended Complaint filed by the Plaintiffs, Robert David Steele and the Earth Intelligence Network (“Plaintiffs”), with prejudice, and award her costs and fees incurred. In support of this Motion, Ms. Negron relies on the arguments and authorities set forth in her accompanying Memorandum in Support of Motion to Dismiss Amended Complaint filed herewith.

Dated: May 11, 2018

Respectfully submitted,

**PATRICIA A. NEGRON**

By: /s/ Terry C. Frank.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 11<sup>th</sup> day of May, 2018, a true copy of the foregoing is being electronically filed with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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